

# Baldwin-Nashville Telephone Company, Inc.

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## Annual 47 CFR § 64.2009(e) CPNI Certification Template EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2019 covering the prior calendar year 2018.

1. Date: 2/6/2019
2. Name of company(s) covered by this certification: Baldwin Nashville Telephone Co., Inc
3. Form 499 Filer ID: 809020
4. Name of signatory: Brian Rickels
5. Title of signatory: Manager/Ceo

6. Certification:

I, Brian Rickels, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 CFR § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



**Attachments:** Accompanying Statement explaining CPNI procedures

Baldwin Nashville Telephone Company (hereinafter referred to as "Company")  
Certification of CPNI Filing

1. Company does not use CPNI for marketing purposes.
2. Company personnel are trained as to what information is classified as CPNI and do not use CPNI for marketing purposes.
3. Company and its employees carefully preserve the confidentiality of CPNI.
4. Company prohibits releasing call detail information or private information to customers during customer-initiated telephone contact except when the customer provides a password. If a customer does not provide a password, we prohibit the release of call detail information except by sending it to an address of record or by the Company personnel calling the customer at the telephone of record. We also require our staff to provide CPNI to customers based on in-store contact with valid photo ID.
5. Company requires its personnel to notify the customer immediately when a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed.
6. Company extended the application of the CPNI rules to VoIP customers.
7. Company has implemented appropriate safeguard policies for CPNI and has documented them in the Company's procedures for training personnel.
8. Company is submitting the CPNI Compliance Certificate in response to the Public Notice issued by the FCC on January 28, 2008, in DA-08-171 pursuant to 47 C.F.R. § 64.2009(e), EB Docket No. 06-36.